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BY ECF

July 16, 2025

The Honorable Pamela K. Chen
United States District Judge
United States District Court, Eastern District
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Securities Exchange Commission v. Xia, et al.* U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC) (JAM)

Dear Judge Chen:

We represent Defendants Richard Xia and Fleet New York Metropolitan Regional Center LLC (“Fleet”) in the above-referenced matter.

Pursuant to the Court’s July 16, 2025 order, we write to inform the Court that our office has transmitted to this chamber, via email, an audio recording of Mr. Xia and his former counsel, Herve Gouraige, at Mr. Xia’s request. This transmission is made in accordance with the Court’s directive that all communications from Mr. Xia be made through counsel.

We also acknowledge receipt of the Court’s July 14, 2025 order and are actively working with our client and the distribution administrator’s team to ensure compliance with this Court’s directives.

In addition, consistent with Mr. Xia’s July 13, 2025 emergency motion (ECF No. 626 at ¶ 10), we respectfully inform the Court that we intend to move for leave to withdraw as counsel of record in the coming weeks. As Mr. Xia explains in his motion, our firm has only served in a limited facilitative role and is not equipped to provide full defense in this SEC matter. In the interim, we will continue to assist defendants, the distribution administrator’s team, and all parties as needed to ensure compliance with the Court’s July 14, 2025 order and related directives.

We appreciate the Court for its attention to this matter.

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PLEASE SEND ALL CORRESPONDENCE TO THE NEW YORK, NY ADDRESS LISTED ABOVE.

Respectfully submitted,

/s/ Robert J. Hantman, Esq.
*Attorney for Defendant Xia
and Fleet*